



Forest & Bird

TE REO O TE TAIAO | *Giving Nature a Voice*

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Feedback on Selwyn District Council Draft Biodiversity Strategy Protecting Our Natural Heritage

Forest & Bird is New Zealand's oldest environmental non-government organisation. Currently celebrating its 100th anniversary, and since 1923 the Society has continuously advocated for the protection and preservation of New Zealand's native plants and animals. Our local members continue to be a strong advocates for protecting and restoring the district's indigenous biodiversity and for raising the awareness of the special plants and animals that call the Selwyn district home.

Forest & Bird welcomes and is pleased to provide further feedback on the Selwyn District Council Draft Biodiversity Strategy "*Protecting Our Natural Heritage*".

Forest & Bird was a key stakeholder in the development of the National Policy Statement for Indigenous Biodiversity (NPSIB), gazetted on 1 August 2023, providing the much-needed national direction. We commend the council on this action to establish a biodiversity strategy for the district in response to the NPSIB.

Forest & Bird was a key stakeholder in the development of the New Zealand Biodiversity Strategy 2020 Te Mana o te Taiao, New Zealand's response to its international commitment to the Convention on Biological Diversity. Te Mana o te Taiao is a 'cross sector' document, which contains 2025, 2030 and 2050 goals for New Zealand's indigenous biodiversity and relies on all sectors, across the nation, to adopt its goals if its objectives are to be achieved. This is important context and we strongly support the alignment of the Selwyn Biodiversity strategy with Te Mana o te Taiao goals.

Forest & Bird provided feedback on the early draft and we are grateful that many of our suggestions have been adopted into the final draft. Forest & Bird strongly supports the Selwyn draft biodiversity strategy vision and priorities, particularly the priority to **protect what remains and then restore the district's indigenous biodiversity**.

In addition to our earlier feedback, we recommend:

That the strategy could be further strengthened by alignment with national direction for climate mitigation and adaptation. The role of well-functioning natural ecosystems and indigenous biodiversity, in both the urban and the rural environment, as a nature-based solution for climate change resilience, is being increasingly understood as vital.

Both the National Adaptation Plan (NAP) and the Emissions Reduction Plan (ERP) focus on nature-based solutions as a priority in planning and regulatory systems to address the climate and biodiversity crises together. The recent advice from the Climate Commission to the Government on the country's second ERP reinforces this.¹ The Selwyn Biodiversity Strategy is a good vehicle to demonstrate how the Nap and the ERP can be implemented at the local level.

The *Executive Summary* (p4) and at 2. *The Strategy* paragraph five 9 (p7), for clarification, the following statement requires a comma, as follows:

Council is required, under Section 6(c) of the Resource Management Act, 1991 (RMA), to recognise and provide for the protection of areas of "significant indigenous vegetation and significant habitats of indigenous fauna" on land it administers, as a matter of national importance.

Table (pp11-12) *Alluvial Plains* - This part appears to relate to a terrestrial environment, so the freshwater fish species listed may be better included in the freshwater ecosystem parts of the table.

Goal 2 Target 1.4 *From 2024 onwards there is no net loss of indigenous flora and fauna, habitats, and ecosystems within Selwyn. Effective monitoring programs are in place to ascertain no net loss.* Notwithstanding that it is almost 2024, this Target does not require a date and in response to the biodiversity crisis would be better expressed as no further loss of indigenous flora and fauna, or native habitats and ecosystems within Selwyn.

Goal 2 Action 6 *Effective monitoring programs are in place to ascertain no net loss. Collate and summarise existing information and undertake ecological surveys where required to establish the current state of indigenous biodiversity within the district.* This action is fundamental to protecting and maintaining indigenous biodiversity so should be actioned as a top priority.

Goal 2 Action 9 *Develop and action suitable responses to key biodiversity issues including unconsented development, biosecurity issues including new incursions (of pest plants and animals) and climate change pressures.* This action should be separated out in to two actions. One that relates to statutory compliance, monitoring and enforcement (RMA and Biosecurity Act/Regional Pest Management Plan compliance) and another that relates to the response to new biosecurity incursions. This will likely require working closely with ECan and the Ministry for Primary Industries.

Goal 4 Action 25 *Develop and action climate change responses to build resilience and adaption into our key areas of urban indigenous biodiversity.* This action should be promoted district wide (not just urban areas), so that all of the district's areas of indigenous biodiversity and its human communities can adapt and build resilience to the effects of climate change, through the use of nature-based solutions.

¹ <https://www.climatecommission.govt.nz/our-work/advice-to-government-topic/advice-for-preparation-of-emissions-reduction-plans/2023-draft-advice-to-inform-the-strategic-direction-of-the-governments-second-emissions-reduction-plan-april-2023/2023-advice-on-the-direction-of-policy-for-the-governments-second-emissions-reduction-plan/>

Finally, the success of the strategy and achievement of its goals, relies on adequate resourcing. We recommend that the council allocate sufficient funding through its Long-Term Plan to ensure the strategy can be implemented.

If there is opportunity to be heard, Forest & Bird would like to present.

Thank you very much for the opportunity to provide feedback.

Nāku noa, nā

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